## STATE OF COLORADO



Colorado Department of Human Services

people who help people

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Bill Owens Governor

Marva Livingston Hammons Executive Director

March 11, 2002

Rules Docket Clerk Office of the General Counsel Federal Emergency Management Agency 500 C Street, SW Room 840 Washington, DC 20472

SUBJECT: FEMA Proposed Rule Change

This letter is in response to your request for comments on the proposed rule changes for the Federal Emergency management Agency (FEMA). After careful review of the proposed changes, the Colorado Department of Human Services (CDHS) made the following observations:

- 1. Agree with the rule interpretation from Office of Management and Budget (OMB) that various flood insurance purchase mandates apply only to housing units that are placed in designated flood hazard areas.
- 2. Support a new provision in the regulations that authorizes FEMA to share applicant information with states in order to facilitate the provision of additional state and local assistance to disaster victims.
- 3. Support keeping the current Group Flood Insurance Policy process that allows the use of Individual and Family Grant (IFG) funds to purchase the first three years of flood insurance for disaster victims.
- 4. At this time, Colorado is leaning toward options that allow active state participation in assisting disaster victims (2 or 3). Final selection of an option will be determined after accessing the impact of integrating direct housing into the current IFG process.

Thank you for the opportunity to review and comment on the proposed rule changes.

Sincerely,

Executive Pirector

cc: Grier, Tom

Horton, Patrick Robinson, Deb